

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

AFFIDAVIT

v.

Criminal Action No. 12-CR-579 (TJM)

**GLENN R. UNGER,**  
Defendant.

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STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF ONONDAGA )

RANSOM P. REYNOLDS, being duly sworn, deposes and says:


1. That I am an Assistant United States Attorney for the Northern District of New York, and have been assigned to handle this matter. I am therefore fully familiar with all the facts, circumstances and prior proceedings had herein.
2. That this affidavit is submitted in support of your affiant's request for (1) an Order to Show Cause, as to why the Magistrate's ECF text notice/release order should not be revoked, and (2) the detention of the defendant.
3. The factual assertions made in the attached Memorandum of Law and in the government's motion for detention are based upon information provided by Special Agents Christopher West of the Federal Bureau of Investigation and Julie Carruthers of the Internal

Revenue Service and the review of evidence recovered from the defendant's residence and storage unit.

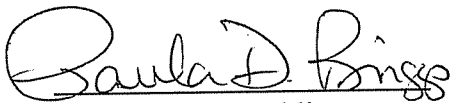
**WHEREFORE**, it is respectfully requested that this Court:

(1) Issue an Order to Show Cause, as to why the Magistrate's ECF text notice/release order should not be revoked; and

(2) Revoke said release order and order the pretrial detention of the defendant.

  
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Ransom P. Reynolds  
Assistant U.S. Attorney

Sworn to before me this  
14<sup>th</sup> day of January, 2013



Notary Public  
PAULA D. BRIGGS  
Notary Public, State Of New York  
No. 6068241  
Qualified In Onondaga County  
My Commission Expires 12/31/20 13